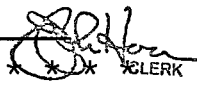


UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

**FILED**

**FEB 24 2017**

\*\*\*\*\*  
Civil Action File Number 17-cv-4026  CLERK

\*\*\*\*\*  
LESLIE JOHNSON,  
Plaintiff,

vs.

STATE OF SOUTH DAKOTA, aka,  
SOUTH DAKOTA DEPARTMENT OF  
CORRECTIONS, DENNY KAEMINGK,  
SECRETARY OF CORRECTIONS: CBM  
FOOD SERVICE INC., aka. MARLIN  
C. SEJNOHA JR.  
Defendant's

COMPLAINT FOR VIOLATIONS OF  
FEDERAL LAW

\*\*\*\*\*

COMES NOW, Leslie Johnson, hereinafter known as Plaintiff, Pro Se, herein filed with this Honorable Court a Complaint for Violations of Federal Law, along with a demand for damages, as so stated herein as follows:

STATEMENT OF JURISDICTION:

Plaintiff is a citizen of the State of South Dakota, and the Defendant's are Corporations operating as Public Corporations, such as the STATE OF SOUTH DAKOTA, aka, DEPARTMENT OF CORRECTION, and the other Defendant, CBM FOOD SERVICE INC. aka. MARLIN C. SEJNOHA, is an Interstate Corporation operating in various STATE'S, which is incorporated under the Laws of the STATE OF SOUTH DAKOTA. This matter in controversy exceeds, exclusive of interest and costs, the sum specified by Title 28 U.S.C. § 1332, This action arises under the Sherman Antitrust Act, as amended by the Clayton Act in 1914, and title 15 U.S.C.A. § 1-7.

EXHAUSTING OF ADMINISTRATIVE REMEDY:

Plaintiff, has attempted to remedy this matter through the Administrative Remedy process as stated herein as follows:

1. Plaintiff on December 22, 2015, filed an Informal Resolution Request (hereinafter know as IRR) concerning the issue of CBM'S Monopoly over all our food at the Prison. See: IRR # 12525. The reply to said IRR was (Rejected--not a grievable issue). See: Response.

2. Plaintiff on August 15, 2016 filed an IRR, concerning CBM'S Monopoly pertaining to Religious Foods, purchased. See: IRR # 16459.

South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
Please Refer To DOC policy 1.3.E.2  
Administrative Remedy for Inmates

## INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson

Last Name

Leister

First Name

Inmate Number: 000006310

Date: 12-22-15

Unit: M.O.S.P.-H-102-A

State your problem/complaint. Be specific, giving dates, times and places:

RE: C.B.M. MONOPOLY  
FACT: C.B.M. HAS BOTH THE FOOD SERVICE AND COMMISSARY CONTRACTS FOR S.D.D.C.  
FACT: AS FOOD SERVICE YOU CAN AND DO MANIPULATE QUALITY, PORTION SIZE,  
TEMP, AND ALL OTHER ASPECTS OF THE FOOD SERVED, IN ORDER TO CAUSE  
STAFF AND INMATES GROWING COMMISSARY, IT IS A KNOWN  
FACT THAT HUNGRY SHOPPERS BUY MUCH MORE FOOD AND EMPLOY  
SHOP THEREFORE DRIVING UP THE COMMISSARY SALES AND PROFITS  
FOR C.B.M. AND THE S.D.D.C. CAUSING A MONOPOLY

What action are you requesting: I WANT TO KNOW WHY S.D.D.C. ADMINISTRATION  
MANE STAFF AND OFFICIALS WOULD ALLOW C.B.M. TO MANIPULATE THE  
FOOD QUALITY, PORTION SIZE, TEMPS OF THE FOOD AND OTHER MEANS  
TO DISCOURAGE INMATES EATING SO AS TO DRIVE UP  
COMMISSARY PURCHASES AT PAY ROLL TIME

For Staff Use:

Date Received: 12-22-15

Received By: [Signature]

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_ By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1<sup>st</sup> Copy: To Inmate after Staff Response. PURSUANT TO F.R.C.P. RULE # 26 ANY

2<sup>nd</sup> Copy: To Unit File after Staff Response. INFORMATION RECEIVED WILL BE

3<sup>rd</sup> Copy: To Inmate after receipting in. USED AS DISCOVERY

**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Informal Resolution Response**

**REFERENCE #:** 12525

**NAME OF COMPLAINANT:** Leslie Johnson

**DOC #:** 0000008310

**DATE:** 12/31/2015

**LOCATION:** Mike Durfee State Prison

**RE:** Food Service

**STATUS:** Denied

**OFFICIAL RESPONSE:**

Rejected--not a grievable issue.

**X** Deb Eilers / Deb Eilers

Unit Coordinator

Original – Save to System.  
Copy 1- To Inmate.



South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
Please Refer To DOC policy 1.3.E.2  
Administrative Remedy for Inmates

# INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson  
Last Name

Leslie  
First Name

Inmate Number 0000008310

Date: 8-7-16

Unit: M.D.S.P.-H-102-A

State your problem/complaint. Be specific, giving dates, times and places:

RE: 8th & 14th AMENDMENT VIOLATIONS  
16459  
D.O.C. ADMINISTRATION AT M.D.S.P. TELLS INMATES ANY AND ALL FOODS COMING INTO THE PRISON MUST BE PREPARED BY C.B.M. AS WELL AS ORDERED FROM C.B.M. OR AT LEAST COME THROUGH C.B.M. THIS INCLUDES ALL RELIGIOUS FOODS PURCHASES OR DONATIONS. THE FOOD MUST BE PREPARED BY C.B.M. BECAUSE THAT IS WHAT SINCE FALLS IS DOING. THE FACTS ARE THAT INMATES IN S.F. ARE STILL ORDERING OUTSIDE FOODS SUCH AS CHICKEN, DONUTS, PIZZA, AND SUBS. (SEE PAGE TWO OF THIS I.R.R.)

What action are you requesting: I WANT TO KNOW WHY D.O.C. ADMINISTRATION AT M.D.S.P. IS VIOLATING THE 14th AMENDMENT, EQUAL TREATMENT AND PROTECTION FOR ALL ALONG WITH THE 8th AMENDMENT. CRUEL AND UNUSUAL PUNISHMENT. BY FORCING C.B.M. ON INMATES FOR ANY AND ALL FOODS ENTERING THE PRISON

For Staff Use:

Date Received: 8.8.16

Received By: Julie Stevens

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_ By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1st Copy: To Inmate after Staff Response.

2nd Copy: To Unit File after Staff Response.

3rd Copy: To Inmate after receipting in.

PURSUANT TO F.A.C.P. RULE #26 ANY INFORMATION RECEIVED WILL BE USED AS DISCOVERY

16459

PAGE TWO OF 8<sup>th</sup> + 14<sup>th</sup> AMENDMENT VIOLATIONS, I. R. A.

THESE RELIGIOUS FEEDS ARE STILL BEING DONE  
THE SAME WAY. (EXAMPLE)

THERE ST. DYSMAS REFORMATION MEAT IS  
STILL DONATED AND IS STILL BURGERS AND  
BRATTS. AS IT HAS ALWAYS BEEN.

**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Informal Resolution Response**

**REFERENCE #:** 16459

**NAME OF COMPLAINANT:** Leslie Johnson

**DOC #:** 0000008310

**DATE:** 08/15/2016

**LOCATION:** Mike Durfee State Prison

**RE:** Food Service

**STATUS:** Denied

**OFFICIAL RESPONSE:**

Rejected - cannot grieve as a group.

**X** Deb Eilers / Deb Eilers

Unit Coordinator

Original – Save to System.  
Copy 1- To Inmate.



South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
Please Refer To DOC policy 1.3.E.2  
Administrative Remedy for Inmates

# INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson Last Name

Leslie First Name

Inmate Number: 000008310

Date: 8-19-16

Unit: M.D.S.P. 14-102-A

State your problem/complaint. Be specific, giving dates, times and places:

RE: 8th + 14th Amendment Violations

I HAVE ATTENDED ST. DYSMAS CHURCH FOR THE PAST 3-4 YRS. AS A ELCA PRISON CONGREGATION THEY CELEBRATE AND ATTEND THE LUTHERAN REFORMATION ANNUALLY. THROUGH DONATIONS FROM THE OUTSIDE CHURCHES THE TRADITIONAL MEAL IS A BURGER, A BAKED AND THINNING. THE O.C. ADMINISTRATION AT M.D.S.P. HAS STOPPED ANY AND ALL FOODS FROM COMING INTO THE PRISON UNLESS C.D.M. ORDERS AND PERMITS ALL FOODS. ALL THIS BECAUSE SINCE FALLS IS DOING SUCH. BUT THE FACT IS (SEE PAGE TWO)

What action are you requesting: I WANT THE ~~ADMINISTRATIVE~~ ADMINISTRATION AT M.D.S.P. TO STOP ALL CIVIL RIGHTS VIOLATIONS, AND RETURN THE HANDLING OF THE LUTHERAN REFORMATION MEAL BACK TO ST. DYSMAS

For Staff Use:

Date Received: 8-19-16

Received By: Julie Stevens

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_ By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1<sup>st</sup> Copy: To Inmate after Staff Response.

2<sup>nd</sup> Copy: To Unit File after Staff Response.

3<sup>rd</sup> Copy: To Inmate after receipting in.

PUSUANT TO F.R.C.P. RULE #26 ANY INFORMATION RECEIVED WILL BE USED AS DISCOVERY

16457

PAGE TWO OF I.R.A. 8<sup>th</sup> & 14<sup>th</sup> Amendment Violations

SIoux Falls is not doing this Therefore  
this type of separation of Prisons is a 14<sup>th</sup>  
Amendment violation of Fair and Equal  
Treatment. Any form of forcing is a 8<sup>th</sup>  
Amendment violation of Cruel and Unusual  
Punishment.



**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Informal Resolution Response**

**REFERENCE #:** 16657

**NAME OF COMPLAINANT:** Leslie Johnson

**DOC #:** 0000008310

**DATE:** 08/25/2016

**LOCATION:** Mike Durfee State Prison

**RE:** Religious

**STATUS:** Informational

**OFFICIAL RESPONSE:**

Religious Programs are approved through the Project Applications with orders going through CBM.

X Deb Eilers / Deb Eilers

Unit Coordinator

Original – Save to System.  
Copy 1- To Inmate.

South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Request For Administrative Remedy  
Please refer to DOC policy 1.3.E.2  
Administrative Remedy for Inmates

RE: 16657

## REQUEST FOR ADMINISTRATIVE REMEDY

Inmate Name: Johnson Leslie Inmate Number 0000008310  
Last Name First Name  
Date: 8-28-16 Unit M.D.S.P. - H-102-4

State your problem, complaint and the action you request. (Attach original Informal Request Form.)

USE OF A PROTECT APPLICATION HAS NO BEARING ON THE FACTS THAT OUR  
RELIGIOUS GROUP IS ALLOWED OUR THING AND THE M.D.S.P. RELIGIOUS GROUP IS DENIED  
THE SAME THING. AS PROOF THE 8th AND 14th AMERICAN RIGHTS VIOLATIONS ARE STILL  
IN PRACTICE AND STILL DELIBERATE. I STILL WANT THE ADMINISTRATION AT  
M.D.S.P. TO STOP ALL CIVIL RIGHTS VIOLATIONS AND ALLOW ALL RELIGIOUS  
GROUPS THE SAME FAIR AND EQUAL TREATMENT WITH OUT ANY FORM OF  
FORCING

Do not write below this line. Use additional paper if necessary.

Date Received: 8-29-16 JP Reference: 16657

Received By: B. Fluke  
(Administrative Remedy Coordinator Designee)

Assigned To: N. Christensen

Date Reply Received: 9/1/16 Sent to Inmate On: 9-7-16

Original: To Administrative Remedy File after Warden's response completed.

Copy 1: To Central Records if disciplinary or classification.

Copy 2: To the Inmate with the Warden's response.

Copy 3: To the Unit File with the Warden's response.

Copy 4: To the Inmate when the form is first turned in.

PURSUANT TO S.D.C.P. Rule #26 ANY  
INFORMATION RECEIVED WILL BE  
USED AS DISCOVERY

**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Administrative Remedy Response**

**REFERENCE #:** 16657  
**NAME OF COMPLAINANT:** Leslie Johnson  
**DOC #:** 0000008310  
**DATE:** 08/31/2016 **LOCATION:** Mike Durfee State Prison  
**RE:** Religious **STATUS:** Informational

**OFFICIAL RESPONSE:**

This is in response to your request for Administrative Remedy wherein you state that the Lutheran Reformation meal has been changed from previous years. You requested the meal be organized by the St. Dysmas organization.

This issue has been reviewed. All special religious events are submitted for approval via a project application. Event food menus are reviewed by staff and must meet the Administration's guidelines before being approved. This is for informational purpose.

  
\_\_\_\_\_  
Warden

Original – Save to System.  
Copy 1- To Inmate.



South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
Please Refer To DOC policy 1.3.E.2  
Administrative Remedy for Inmates

RE: 8th & 14th AMENDMENT  
VIOLATIONS

# INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson  
Last Name

Leslie  
First Name

Inmate Number: 0000008310

Date: 8-19-16

Unit: M.D.S.P.-H-102-A

State your problem/complaint. Be specific, giving dates, times and places:

FOR SEVERAL YRS. ~~2~~ <sup>TWICE</sup> ANNUALLY I HAVE BEEN ALLOWED TO PURCHASE  
FROM OUTSIDE VENDORS. FOODS SUCH AS PIZZA, CHICKEN, BURGERS, AND  
DONUTS. NOW THE ADMINISTRATION AT M.D.S.P. SAYS SINCE FHS IS  
USING C.B.M. FOR ALL PURCHASED FOODS, SO M.D.S.P. MUST DO THE SAME.  
THE FACT IS SINCE FHS IS NOT DOING THIS AT ALL. THIS IS A BLATANT AND  
DELIBERATE SEPARATION OF PRISONERS AS A 14th AMENDMENT VIOLATION  
OF FAIR AND EQUAL TREATMENT. (SEE PAGE TWO)

What action are you requesting:

I WANT THE ADMINISTRATION AT  
M.D.S.P. TO STOP ALL CIVIL RIGHTS VIOLATIONS.  
AND REINSTATE MY ABILITY TO PURCHASE  
FOODS VIA OUTSIDE VENDORS.

For Staff Use:

Date Received: 8-19-16

Received By: Julie Stevens

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_ By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1st Copy: To Inmate after Staff Response.

2nd Copy: To Unit File after Staff Response.

3rd Copy: To Inmate after receipting in.

PURSUANT TO F.R.C.A. RULE #26 ANY  
INFORMATION RECEIVED WILL BE  
USED AS DISCOVERY

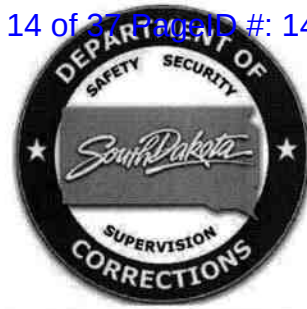


16658

PAGE TWO OF I.R.A. 8<sup>th</sup> & 14<sup>th</sup> AMENDMENT VIOLATIONS

AS WELL ANY FORM OF FORCING IS A 8<sup>th</sup> AMENDMENT  
VIOLATION OF CRUEL AND UNUSUAL PUNISHMENT.

**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Informal Resolution Response**

**REFERENCE #:** 16658

**NAME OF COMPLAINANT:** Leslie Johnson

**DOC #:** 0000008310

**DATE:** 08/25/2016

**LOCATION:** Mike Durfee State Prison

**RE:** Food Service

**STATUS:** Informational

**OFFICIAL RESPONSE:**

Fundraiser's are an optional program that is up to the discretion of Administration.

**X** Deb Eilers / Deb Eilers

Unit Coordinator

Original – Save to System.  
Copy 1- To Inmate.

South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Request For Administrative Remedy  
Please refer to DOC policy 1.3.E.2  
Administrative Remedy for Inmates

## REQUEST FOR ADMINISTRATIVE REMEDY

REL: 16658

Inmate Name: Johnson Last Name Leslie First Name Inmate Number 0000008310  
Date: 8-28-16 Unit M.D.S.P.-H-102-A

State your problem, complaint and the action you request. (Attach original Informal Request Form.)

EVER AS A FOOD RAISER. THE ADMINISTRATION STILL FORCES ME TO PURCHASE  
THE FOOD FROM C.A.M. A SSBOR WHICH SINCE THIS IS NOT FAIR WITH  
THAT FACT SHOWS THE 8th & 14th AMENDMENT VIOLATIONS ARE DELIBERATE  
I STILL WANT THE ADMINISTRATION AT M.D.S.P. TO STOP ALL  
DELIBERATE CIVIL RIGHTS VIOLATIONS. AND ALLOW THE PURCHASE OF FOOD  
WITH <sup>OUT</sup> C.A.M. PRICES GOING AND ALLOW OUTSIDE VENDORS FOR FAIR PRICING

Do not write below this line. Use additional paper if necessary.

Date Received: 8-29-16 JP Reference: 16658

Received By: B. Fluke  
(Administrative Remedy Coordinator Designee)

Assigned To: N. Christensen

Date Reply Received: 9/1/16 Sent to Inmate On: 9-1-16

Original: To Administrative Remedy File after Warden's response completed.

Copy 1: To Central Records if disciplinary or classification.

Copy 2: To the Inmate with the Warden's response. PURSUANT TO F.A.L.P. RULE # 26 ANY

Copy 3: To the Unit File with the Warden's response. INFORMATION RECEIVED WILL BE

Copy 4: To the Inmate when the form is first turned in. USED AS DISCOVERY

**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Administrative Remedy Response**

**REFERENCE #:** 16658

**NAME OF COMPLAINANT:** Leslie Johnson

**DOC #:** 0000008310

**DATE:** 08/31/2016

**LOCATION:** Mike Durfee State Prison

**RE:** Food Service

**STATUS:** Informational

**OFFICIAL RESPONSE:**

This is in response to your request for Administrative Remedy wherein you state that you are being forced to purchase food from CBM when participating with a fundraising event. You requested to be allowed to purchase food from an outside vendor.

This issue has been reviewed. Inmates are not required to participate in a fundraising event where food can be purchased. Fundraising events and details are approved at the Warden's discretion. This is for informational purposes.

  
Warden



South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
Please Refer To DOC policy 1.3.E.2  
Administrative Remedy for Inmates

## INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson  
Last Name

Leslie  
First Name

Inmate Number 000008310

Date: 8-30-16

Unit: M.D.S.P.H-102-A

State your problem/complaint. Be specific, giving dates, times and places:

I HAVE ~~THE~~ ISCHEMIC CARDIOMYOPATHY, CORONARY ARTERY DISEASE, DILATED CARDIOMYOPATHY, TWO STENTS, LEFT BRANCH BLOCK, AND A PACER MAKER/DEFIBRILLATOR. WITH ALL THIS I SHOULD BE ON A HEART HEALTHY DISEASE PLAN AS APPROVED BY THE AMERICAN HEART ASSOCIATION, AVERA HEART HOSPITAL OF SOUTH DAKOTA, AND THE A.M.A. BECAUSE C.B.M.'S VIEW OF HEART HEALTHY IS A REGULAR TALK EXCEPT FOR BUTTER OR OILS, YOU IN GET HAN, SHORT GRAIN WHITE RICE, ENRICHED W/TE PASTA, PROCESSED (SEE PAGE TWO)

What action are you requesting: I WANT TO KNOW WHY C.B.M. DOES NOT HAVE A HEART HEALTHY DISEASE PLAN APPROVED BY THE AMERICAN HEART ASSOCIATION, AVERA HEART HOSPITAL OF SOUTH DAKOTA, AND THE A.M.A. AND MEETS ALL THE U.S. GOVERNMENT REQUIREMENTS AS WELL. LACK OF PROPER DISEASE CAUSES SERIOUS MEDICAL ISSUES THAT ARE CAUSED.

For Staff Use:

Date Received: 8.31.16

Received By: Julie Stevens

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_

By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1<sup>st</sup> Copy: To Inmate after Staff Response.

2<sup>nd</sup> Copy: To Unit File after Staff Response.

3<sup>rd</sup> Copy: To Inmate after receipting in.

PURSUANT TO F.A.C.P. RULE #26 ANY INFORMATION RECEIVED WILL BE USED AS DISCOVERY

16789

PAGE TWO OF NO PROPER DIET, 8-30-16

COLD BREAKFAST CREAM, INSTANT OAT MEAL, AMONG OTHER  
FOODS NOT HEART HEALTHY

**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Informal Resolution Response**

**REFERENCE #:** 16789

**NAME OF COMPLAINANT:** Leslie Johnson

**DOC #:** 0000008310

**DATE:** 09/09/2016

**LOCATION:** Mike Durfee State Prison

**RE:** Food Service

**STATUS:** Informational

**OFFICIAL RESPONSE:**

All special diets are approved by a registered dietician.

**X** Deb Eilers / Deb Eilers

Unit Coordinator

Original – Save to System.  
Copy 1- To Inmate.



South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Request For Administrative Remedy (G-10)  
Please refer to DOC policy 1.3.E.2  
Administrative Remedy for Inmates

## REQUEST FOR ADMINISTRATIVE REMEDY

RE: 16789

Inmate Name: Johnson Leslie Inmate Number: 000006310  
Last Name First Name

Date: 9-10-16 Unit: M.O.S.P.-H-102-A

State your problem, complaint and the action you request. (Attach original Informal Request Form.)

HAVING A REGISTERED DIETITIAN DOES NOT GUARANTEE THAT YOU HAVE  
A DIET APPROVED BY THE AMERICAN HEART ASSOCIATION, AHA HEART HOSPITAL  
OF S.D. OR EVEN A.M.A. JUST THE TAKING OF THE SUGAR AND THE DIET  
DOES NOT MAKE A HEART HEALTHY DIET. I WANT TO KNOW WHY C.B.M.  
REFUSES TO HAVE A HEART HEALTHY DIET APPROVED BY THE AMERICAN HEART  
ASSOC. OR AHA HEART HOSP. OF S.D. OR AT LEAST THE A.M.A.

Do not write below this line. Use additional paper if necessary.

Date Received: 9-12-16 JP Reference: 16789

Received By: B. F. Luke  
(Administrative Remedy Coordinator Designee)

Assigned To: J. Stevens

Date Reply Received: 9/19/16 BF BT Sent to Inmate On: 9-21-16 JP

Original: To Administrative Remedy File after Warden's response completed.

Copy 1: To Central Records if disciplinary or classification.

Copy 2: To the Inmate with the Warden's response.

Copy 3: To the Unit File with the Warden's response.

Copy 4: To the Inmate when the form is first turned in.

PURSUANT TO F.A.C.P. RULE #26 ANY  
INFORMATION RECEIVED WILL BE  
USED AS O'S LOVELY



**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Administrative Remedy Response**

**REFERENCE #:** 16789

**NAME OF COMPLAINANT:** Leslie Johnson

**DOC #:** 0000008310

**DATE:** 09/16/2016

**LOCATION:** Mike Durfee State Prison

**RE:** Food Service

**STATUS:** Informational

**OFFICIAL RESPONSE:**

This is in response to your request for Administrative Remedy wherein you question how the Heart Healthy diet is created.

This issue has been reviewed and the Dietician contacted. The Heart Healthy meals differ from mainline trays in that the sodium, saturated fat, total fat and cholesterol amounts are all modified to meet the nutrient goals. This is for informational purposes.

  
\_\_\_\_\_  
Warden

Original – Save to System.  
Copy 1- To Inmate.

South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
Please Refer To DOC policy 1.3.E.2  
Administrative Remedy for Inmates

## INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson  
Last Name

Leslie  
First Name

Inmate Number: 0000630

Date: 9-9-16

Unit: M.D.S.A.-H-102-A

State your problem/complaint. Be specific, giving dates, times and places:

BASED ON THE ALLEGATIONS OF I.R.A.'S #12525, 16459, ALONG WITH THE RESPONSE'S TO I.R.A.'S #16657 & 16658. IT IS CLEAR AND EVIDENT THAT S.D.D.O.C. AND ITS ADMINISTRATION PROMOTE AND ENCOURAGE THE HAVING OF A MONOPOLY BY C.B.M. AND AS THE MONOPOLISTS C.B.M. IS ALLOWED TO MONOPOLIZE AND CAPITALIZE FROM ANY AND ALL FOODS ENTERING INTO MISSOURI STATE PRISON. (LOCATED IN SPRINGFIELD, S.D.)

What action are you requesting: I WANT TO KNOW WHY THE S.D.D.O.C. AND ITS ADMINISTRATION AT M.D.S.A. WOULD PROMOTE AND ENCOURAGE ANY FORM OF A MONOPOLY, MONOPOLIZING, OR THE MONOPOLISTIC PRACTICES BY CATERED BY MARIENS (C.B.M.)

For Staff Use:

Date Received: 9-9-16

Received By: Julie Stevens

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_ By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1<sup>st</sup> Copy: To Inmate after Staff Response.

2<sup>nd</sup> Copy: To Unit File after Staff Response.

3<sup>rd</sup> Copy: To Inmate after receipting in.

PURSUANT TO F.A.R. RULE #26 ANY INFORMATION RECEIVED WILL BE USED AS DISCOVERY

SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE



**Informal Resolution Response**

REFERENCE #: 16893

NAME OF COMPLAINANT: Leslie Johnson

DOC #: 0000008310

DATE: 09/16/2016

LOCATION: Mike Durfee State Prison

RE: Food Service

STATUS: Denied

**OFFICIAL RESPONSE:**

Rejected - issue has already been addressed.

X Deb Eilers / Deb Eilers

Unit Coordinator



SWORN STATEMENT OF EVENTS LEADING TO THE  
DENIAL OF HELP BY U.N.I.T STAFF DEB EILERS

ON 9-19-16 AT ABOUT 12:25 PM. I WAS  
CALLED TO U.C. EILERS OFFICE. PER. OPEN DOOR  
PROCEDURES.

I ASKED U.C. EILERS. WHAT GRIEVANCE SHE WAS  
REFERENCING WHEN SHE REJECTED GRIEVANCE  
NO. 16893? HER RESPONSE WAS I DON'T TELL YOU  
WHAT GRIEVANCE WAS USED. I DON'T BELIEVE THERE  
IS A GRIEVANCE AGAINST C.B.M. FOR MONOPOLY. THERE  
IS GRIEVANCE # 14638 AGAINST HEALTH SERVICES  
FOR MONOPOLY.

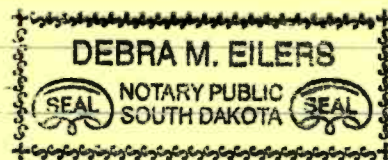
I LESLIE JOHNSON SWEAR THIS STATEMENT TO BE  
THE TRUTH!

DONE THIS 20 DAY OF SEPT. 2016  
By Leslie Johnson signed Leslie Johnson  
SUBSCRIBED AND SWORN TO BEFORE ME NOW THIS 20th  
DAY OF SEPT. 2016

Debra M. Eilers  
NOTARY OF PUBLIC

My Commission Expires Nov. 19, 2019

COMMISSION EXPIRES



SEAL OF NOTARY



South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
Please Refer To DOC policy 1.3.E.2  
Administrative Remedy for Inmates

B

## INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson Leslie Inmate Number 000008310  
Last Name First Name  
Date: 9-21-16 Unit M.D.S.P.-H-102-A

State your problem/complaint. Be specific, giving dates, times and places:

ON 9-9-16 I SUBMITTED A I.R.A. ON 9-16-16 I GOT THAT I.R.A. BACK IT WAS  
NUMBERED 16893 AND HAD BEEN REJECTED SAYING ISSUE HAS ALREADY BEEN  
ADDRESSED. ON 9-19-16 AT ABOUT 12:25 P.M. I DROVE DOWN ROAD WITH WIFE EILEEN  
I ASKED WHAT GRIEVANCE SHE REFERENCED AS ALREADY BEEN ADDRESSED.  
SHE REPLIED I DON'T TELL YOU WHAT ONE. THAT STATED ANY I.R.A. CAN  
BE REJECTED FOR ALREADY BEEN ADDRESSED AND CAN'T BE  
PROVED.

What action are you requesting: I WANT TO KNOW WHAT I.R.A. WAS USED  
AS ALREADY BEEN ADDRESSED. TO CHECK FOR PROOF OF SAME

For Staff Use:

Date Received: 9-22-16

Received By: [Signature]

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_ By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1<sup>st</sup> Copy: To Inmate after Staff Response.

2<sup>nd</sup> Copy: To Unit File after Staff Response.

3<sup>rd</sup> Copy: To Inmate after receipting in.

PURSUANT TO F.R.C.P. RULE # 26 ANY  
INFORMATION RECEIVED WILL BE  
USED AS DISCOVERY

**SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE**



**Informal Resolution Response**

**REFERENCE #:** 17006

**NAME OF COMPLAINANT:** Leslie Johnson

**DOC #:** 0000008310

**DATE:** 09/26/2016

**LOCATION:** Mike Durfee State Prison

**RE:** Other

**STATUS:** Informational

**OFFICIAL RESPONSE:**

The IRR number is 12525.

*Julie Stevens* / Julie Stevens

Case Manager

Original – Save to System.  
Copy 1- To Inmate.

South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
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Administrative Remedy for Inmates

## INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson  
Last Name

Leslie  
First Name

Inmate Number: 0000006310

Date: 10-29-16

Unit: M.D.S.P.-H-102-A

State your problem/complaint. Be specific, giving dates, times and places:

*CBM 2ND OFFENSE*  
*17552*  
IN A.M. 15567 C.B.M. Food Service ~~Did not~~ Reported That All Boost Supplement cans are kept refrigerated until moved to serving line. The Boosts have been receiving heat been continuously getting warmer and warmer. 10-27, 28, and 29<sup>30</sup> have each been room temp or warmer. The serving direction on the box reads serve chilled. store at room temp.

What action are you requesting: To have CBM to continue serving the Boost chilled as was stated in A.M. 15567 and not to TAPPEL off after 3 mos. or less.

For Staff Use:

Date Received: 10-31-16

Received By: Julie Stevens

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_ By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1<sup>st</sup> Copy: To Inmate after Staff Response.

2<sup>nd</sup> Copy: To Unit File after Staff Response.

3<sup>rd</sup> Copy: To Inmate after receipting in.

*PURSUANT TO F.R.C.P. RULE 26 ANY INFORMATION RECEIVED WILL BE USED AS DISCRETIONARY*

SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE



**Informal Resolution Response**

REFERENCE #: 17502

NAME OF COMPLAINANT: Leslie Johnson

DOC #: 0000008310

DATE: 11/02/2016

LOCATION: Mike Durfee State Prison

RE: Food Service

STATUS: Denied

**OFFICIAL RESPONSE:**

Rejected--issue has already been addressed.

X Deb Eilers / Deb Eilers

Unit Coordinator

Original – Save to System.  
Copy 1- To Inmate.



South Dakota Department of Corrections  
Policy  
Distribution: Public

Attachment: Informal Resolution Request  
Please Refer To DOC policy 1.3.E.2  
Administrative Remedy for Inmates

A

# INFORMAL RESOLUTION REQUEST

Inmate Name: Johnson Last Name Leslie First Name Inmate Number: 000056310

Date: 12-27-16 Unit: M.O.S.P.-H-102-A

State your problem/complaint. Be specific, giving dates, times and places:

C.B.M. POSTED A MENU FOR THE CHRISTMAS MEAL, 2016. THIS IS A SPECIAL <sup>HOLIDAY</sup> MEAL SO C.B.M. IS PAID EXTRA TO PROVIDE AN ABOVE NORMAL MEAL. THE MENU POSTED READ 1-5 OZ. PORK LOIN, 1 BAKED POTATO, 4 OZ. CARROTS, 4 OZ. ROAST, APPLE SAUCE, 1-PIZZA ROLL, MARGARINE, 1 FROSTED CHOCOLATE CAKE. THE S.D.D.O.C. PAID EXTRA FOR THIS TO BE PROVIDED AND SERVED ON CHRISTMAS DAY. WHAT WAS ACTUALLY PROVIDED WAS AT VERY BEST A 2-OZ. PORK CHOP AND ALL THE REST. THERE WAS NEVER A 5-OZ. PORK LOIN PROVIDED.

What action are you requesting: I WANT TO KNOW, WHY DOES S.D.D.O.C. ADMINISTRATION ALLOW C.B.M. AND SHAREHOLDERS BILL THE S.D.D.O.C. OUT OF THE EXTRA COST TO PREPARE AND PROVIDE A 5-OZ. PORK LOIN, BUT INSTEAD PROVIDE A 2-OZ. PORK CHOP

For Staff Use:

Date Received: 12-28-16

Received By: [Signature]

What steps did you take to resolve the problem?

What was the result of your attempt?

Date Returned to Inmate: \_\_\_\_\_ By \_\_\_\_\_

Original: To Inmate after Staff Response. To be used if appealed.

1<sup>st</sup> Copy: To Inmate after Staff Response.

2<sup>nd</sup> Copy: To Unit File after Staff Response.

3<sup>rd</sup> Copy: To Inmate after receipting in.

PURSUANT TO F.A.R.P. RULE # 26 ANY INFORMATION RECEIVED WILL BE USED AS DISCOVERY

SOUTH DAKOTA DEPARTMENT OF CORRECTIONS  
OFFICIAL RESPONSE



**Informal Resolution Response**

REFERENCE #: 18558

NAME OF COMPLAINANT: Leslie Johnson

DOC #: 0000008310

DATE: 01/06/2017

LOCATION: Mike Durfee State Prison

RE: Food Service

STATUS: Denied

**OFFICIAL RESPONSE:**

Rejected--not a party to the issue.

X Deb Eilers / Deb Eilers

Unit Coordinator

Original – Save to System.  
Copy 1- To Inmate.

The reply again was (Rejected-cannot grieve as a group).

3. Plaintiff on August 25, 2016 filed another IRR # 16657, concerning CBM'S intervention with Religious Meals, pertaining to the Monopoly they have. The reply states: (Religious Programs are approved through the Project Applications with orders going through CBM). On August 19, 2016, Plaintiff filed a Request for Administrative Remedy, (hereinafter known as RFAR) See: attached RFAR # 16657 and the Administrative Remedy Response for the same.

4. Plaintiff on August 25, 2016 filed another IRR # 16658 concerning CBM'S Monopoly concerning our Fundraiser's we are allowed. The reply states: (Fundraiser's are an optional program that is up to the discretion of Administration.) Therefore Plaintiff, filed the RFAR on August 29, 2016. See: attached RFAR and the response for the same.

5. Plaintiff on September 9, 2016 filed another IRR # 16789 concerning CBM'S poor menus and how it effects Plaintiff's health, as a result of CBM'S monopoly. The response stated (All Special diets are approved by a registered dietician) who's name they will not provide to Plaintiff. Therefore, Plaintiff filed the RFAR on the same issue. this was filed on September 12, 2016. See: attached RFAR and the response for the same.

6. Plaintiff on September 09, 2016 filed another IRR # 16893 concerning CBM'S monopoly within the food service's at Mike Durfee State Prison. The response stated (Rejected-issue has already been addressed). Also See: Sworn Statement.

7. Plaintiff on September 26, 2016 filed another IRR # 17006 concerning the rejection of IRR # 16893. In their response they stated (The IRR number is 12525).

8. Plaintiff on November 2, 2016 filed another IRR # 17502 concerning CBM'S actions as a result of their monopoly over us and the lack of oversight by the STATE. The issue was once again (Rejected --issue has already been addressed).

9. Plaintiff on December 27, 2016 filed another IRR # 18558 concerning the meal that was served to us for Christmas. This again shows the effects of the ongoing monopoly the Plaintiff is forced to endure. The response is totally off the wall. (Rejected--not a party to the issue). Where would a response like that come from if it was not a cover-up for the ongoing monopoly.

#### STATE COURT REVIEW

Plaintiff, felt it was necessary to seek State Court relief. Therefore, he filed in the Sixth Judicial Circuit Court in Hughes County, a Writ of Prohibition, on the 4th day of October, 2016. See: Enclosed copy herein. After they Respondent's failed to respond to the Writ, he requested a Case Summary, and the Clerk of Courts provided to him such document. It showed that this action was filed on 10/07/2016. Then on 12/05/2016 he received from that Court a copy of his Order for Waiver of Fees, with a highlighted section above the Circuit Court Judge [Denied 12/05/2016 /s/ barnett.] Therefore Plaintiff being unable to afford the filing fees made another attempt to find remedy in the State Courts, by filing an Application to Assume Original Jurisdiction with the State Supreme Court. This was done on the 27th day of December, 2016. On January 25, 2017 Plaintiff received from the Supreme Court an Order Denying Petition for Writ of Prohibition; Motion for Summary Judgment and Application for Court to Assume Original Jurisdiction. See: Application and Order attached hereto.

#### STATEMENT OF FACTS

Plaintiff declares that the term "STATE" shall include the STATE of SOUTH DAKOTA, SOUTH DAKOTA DEPARTMENT OF CORRECTIONS, and DENNY KAEMINGK, the term "Contractor shall include CBM FOOD SERVICE INC. and MARLIN C. SEJNOHA JR.

1. The STATE contacts with CBM FOOD SERVICE INC. to provide all meals to all South Dakota Department of Corrections Adult Correction Facilities. They have had this type of contractual arrangement for at least the last seven (7) years.
2. The STATE contracts with CBM FOOD SERVICE INC. to provide all the Commissary to all South Dakota Department of Corrections Adult Corrections Facilities. They have been this for at least the last seven (7) years.
3. The STATE at Mike Durfee State Prison has recently required all extra meal (Fund Raising Projects) to be provided by CBM FOOD SERVICE INC.
4. The STATE at Mike Durfee State Prison has recently required all extra meals for Religious activities to be provided by CBM FOOD SERVICE INC. This included Native American POW WOW, which resulted in the Contractor's stealing the Buffalo, but it showed up the day it



was needed.

5. The STATE at Mike Durfee State Prison does allow inmate's to place "OUTSIDE ORDERES". These are orders for items that CBM FOOD SERVICE INC. is not wanting to carry. They are limited to approved "Venders". If CBM FOOD SERVICE INC. wishes to provide the same products regardless of their price for the item the STATE will make us by from them.

6. Plaintiff declares that the fact being CBM FOOD SERVICE INC. is the only Food provider and Commissary provider we are allowed to buy from. Therefore, they use the power of that "Monopoly" to inflict the following acts upon the Plaintiff.

a. Contractor intentionally reduces the quality and quantity of food they serve to inmates with the intent to boost commissary sales. Recently the C/O/ Tyler was seen taking photos of the small portions we were served.

b. Contractor has no hearty health diets that meet any standards as set forth by the American Heart Ass. or any other Medical Ass. affiliated with heart healthy diets. In fact the food that is served to us inmate is causing serious health conditions for many of us. Yet because of the Monopoly they have, we are left with no other remedy.

c. Plaintiff declares the Contractor via their Monopoly uses price controlling to extract unreal price from inmate for the commissary food that is needed just to prevent us from going hungry. Such as Typewriter Ribbons, they charge us \$9.99 per ribbon, while the same UPC coded item can be purchased from Office Depot./ Office Max for \$7.49 each, Walmart's cost is \$8.27 for a two pack with free shipping for an Order over \$50.00. Amazon is \$8.09 for a two pack. Shoplet's cost is \$4.46 per ribbon. LD Printer & Office Supply is \$4.99 (compatible) or \$4.00 each for 3 or more.

d. Contactor sells Ramon Noodles to inmates for .35¢ each. Ads that were obtained from local papers, showed that County Fair was selling the same product for 5 for \$1.00, thats .20¢ each.

e. Contactor sells a cheap peanut butter to us inmate for \$2.99 per 18 oz jar. While County Fair was selling a name brand jar of peanut butter for \$1.39 for a 28 oz. jar.

f. Contractor sells crackers (saltines) for \$1.99 per box. While County Fair had a name brand Saltine Cracker for \$1.29 per box

g. Contractor sells a loaf of wheat bread for \$2.00 per loaf while County Foods are selling Wheat Bread for .99¢ per loaf.

It's plain to see from the sample of prices that are stated above that because of the Monopoly we are under, Plaintiff, is not being able to exercise his rights under the commerce clause of the U.S. Const.



# Friendly Carry Out Service To Your Car

#0102 3.

Brought To You By County Fair "The Friendliest Store In Town"

**County Fair FOOD & FUEL**  
Celebrates 32nd County Fair Birthday Too!



**Maruchan  
Ramen  
Noodles**  
8 Flavors  
**5/\$** | 6 oz



**Shurfine  
Peanut Butter**  
Family Size  
Creamy or Crunchy  
**\$** | **39**  
28 oz



**Keebler  
Zesta  
Saltines**  
**\$** | **29**  
16 oz



**Country Hearth  
Kids' Choice  
Bread**  
Whole Grain White Only  
**99¢** 24 oz

LEGAL ARGUMENT:

1. Plaintiff, declares the legal definition of "Monopoly" as found in Blacks Law Dictionary, Abridged 9th Ed. to wit: " 1. Control or advantage obtained by one supplier or producer over the commercial market within a given region. 2. The market condition existing when only one economic entity produces a particular product or provide a particular service. "

2. Plaintiff declares that title 15 USC § 2 defines a monopoly as: "Every person who shall monopolize, or attempt to monopolize, or combine or conspire with any other person or persons, to monopolize any part of the trade or commerce among the several States, or with foreign nations, shall be deemed guilty of a felony, and on conviction thereof, shall be punished by fine not exceeding \$100,000, 000. if a corporation, or, if any other person, \$1,000,000, or by imprisonment not exceeding 10 years, or both said punishments in the discretion of the Court." Its clear from the contacts with the STATE and CBM FOOD SERVICE INC. that they intentionally conspired to control all the food purchases the Plaintiff or any other inmate is able to purchase, or be served.

3. Plaintiff further declares that title 15 USC § 1 also defines a violation of the restraint of trade to wit: "Every contract, combination in the form of trust or otherwise, or conspiracy, in restraint of trade or commerce among the several States, or with foreign nations, is declares to be illegal. Every person who shall make any contract, or engage in any combination or conspiracy hereby declared illegal shall be deemed guilty, and conviction thereof, shall be punished by fine not exceeding \$1,000,000,000 if a corporation, or if any other person, \$1,000,000, or by imprisonment not exceeding 10 years, or both said punishments, in the discretion of the court.".

4. Plaintiff, declares that the STATE is a Corporation operating within the means of the UNITED STATES, INC. under a municipal Corp. The other defendant "CBM FOOD SERVICE INC." is also an interstate Public Corporation, operating in various other STATES of the Union. Therefore it is beyond doubt that title 15 USC §§ 1-7 does in fact apply to both the Defendant's. Furthermore this Court has jurisdiction over this matter in accordance with, title 15 USC § 4 to wit: "The several district courts of the United States are invested with jurisdiction to prevent and restrain violations of sections 1 to 7 of

this title; and it shall be the duty of the several United States attorneys, in their respective districts, under the direction of the Attorney General, to institute proceedings in equity to prevent and restrain such violations. Such proceedings may be by way of petition setting forth the case and praying that such violation shall be enjoined or otherwise prohibited. When the parties complained of shall have been notified of such petition the court shall proceed, as soon as may be, to the hearing and determination of the case; and pending such petition and before final decree, the court may at any time make such temporary restraining order or prohibition as shall be deemed just in the premises." Its clear that the Federal Government has a "shall" obligation to prevent the STATE and the CONTRACTOR, from continuing such a monopoly, as so stated herein. The Parties known as the Defendant's have had this "Contractual" Monopoly ongoing for over 7 years. It is therefore this Court duty under the Law to prevent this type of violations, that the Defendant's are imposing upon him.

5. Plaintiff herein declares that the, attached copies of his, "Writ of Prohibition", "Motion for Summary Judgment", and "Application to Assume Original Jurisdiction" are hereby incorporated as supporting documents to this Complaint.

#### CONCLUSION AND PRAYER FOR RELIEF

1. Plaintiff declares that the "STATE" and the "CONTRACTOR" as indentified herein have acted in a conspiracy to create a "Monopoly," by contracting with CBM FOOD SERVICE, INC. for the only means of the Plaintiff, to get food of any kind. The requirements of the Contracts are also being drawn into question by the "STATE" or their employees. Furthermore Plaintiff has attempted to exhaust his Administrative remedy, along with attempting to exhaust his STATE Court remedies. . . This resulted in a fruitless effort. Therefore Plaintiff has no other plain or speedy remedy at law, other than to seek relief in the Federal District Court. as stated herein.

Plaintiff prays for the relief as follows:

2. Plaintiff prays this Court will award to him the sum of \$1,000,000.00 one million dollars to be paid by the Defendant's. This amount is derived from the amount of the fine for such violation as set forth in title 15, USC § 1, 2, and 3 of that code. This is lesser amount of all the fines that could be imposed upon the Defendant's.

3. That this Court issue a Temporary restraining Order against




the Defendant's, that would prohibit any further monopolizations against the Plaintiff, and allow the Plaintiff to purchase food/ commissary from a list of approved suppliers.

4. Plaintiff, prays this Court would render the Contracts between the Defendant's to be null and void. And furthermore prevent them from entering into any other contracts for this type of services for a period of time as set forth by the Court.

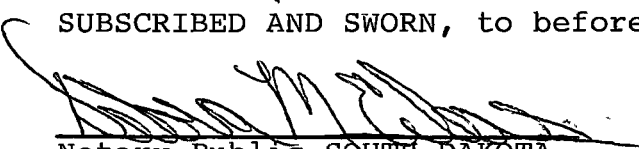
5. Plaintiff, further prays that this Court will afford him any other equitable relief it deems appropriate in this action.

Done this 21 day of February, 2017.

By:   
Leslie Johnson # 8310  
% Mike Durfee State Prison  
1412 Wood Street  
Springfield, South Dakota  
57062

ACKNOWLEDGEMENT

SUBSCRIBED AND SWORN, to before me now this 21<sup>st</sup> day of February, 2017.

  
Notary Public-SOUTH DAKOTA

My Commission Expires: ~~My Commission Expires Nov. 18, 2019~~

SEAL:

